

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>ESCAPEX IP, LLC,</b>	)	
<b>Plaintiff,</b>	)	
	)	<b>Civil Action No. 6:22-cv-00427-ADA</b>
<b>v.</b>	)	
	)	
<b>APPLE, INC.,</b>	)	<b>JURY TRIAL DEMANDED</b>
<b>Defendant.</b>	)	

**PLAINTIFF'S UNOPPOSED MOTION FOR DISMISSAL WITH PREJUDICE**

Under Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff, Escapex IP, LLC moves to dismiss all of Plaintiff's claims against Defendant Apple Inc. in the above-captioned case WITH PREJUDICE. For the avoidance of doubt, this motion does not preclude Apple Inc. from pursuing any future claims or defenses relating to U.S. Patent No. 9,009,113.

Dated: October 25, 2022

Respectfully submitted,

**Ramey LLP**



---

William P. Ramey, III  
Texas State Bar No. 24027643  
5020 Montrose Blvd., Suite 800  
Houston, Texas 77006  
(713) 426-3923 (telephone)  
(832) 900-4941 (fax)  
[wramey@rameyfirm.com](mailto:wramey@rameyfirm.com)

*Attorneys for Escapex IP, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that October 25, 2022, the foregoing document was served on all counsel of record who have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/William P. Ramey, III  
William P. Ramey, III